

# **EXHIBIT A**

**Redacted**

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**From:** Rex Lee <rexlee@quinnemanuel.com>  
**Sent:** Wednesday, August 4, 2021 4:55 PM  
**To:** Sexton, Scott  
**Cc:** Bowman, Andrew M.; Erika Morabito  
**Subject:** LeClairRyan, PLLC

**FilingDate:** 8/4/2021 6:26:00 PM

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Scott:

As a professional courtesy, we are writing to inform you of two pleadings in relation to [REDACTED] that the Trustee intends to file tomorrow so that they can be heard at the August 19 omnibus hearing. First, the Trustee plans to seek leave to amend the Trustee's complaint in the adversary proceeding with ULX to, among other things, add [REDACTED] as a defendant in that case. Although your client has elected mediation under the FAO procedures order, his direct role in the events of the ULX case and the overlapping nature of the claims against him, along with other considerations, makes his addition to that proceeding the most efficient and appropriate course of action. In that respect, the Trustee also intends to file a motion to amend the FAO procedures to, among other things, permit the addition of [REDACTED] to the pending adversary proceeding. Notwithstanding this, she remains, of course, open to resolving the claims with [REDACTED] in mediation or otherwise. And to the extent agreement can be reached with [REDACTED], he would of course be removed as a defendant to that pending litigation.

We are prepared to send you a copy of the proposed Amended Complaint by no later than tomorrow morning, and request that you advise whether your client will consent to the amendment by no later than 12:00 PM ET. Before we provide a copy of the proposed Amended Complaint, however, please confirm that you and your client will treat the papers as "Confidential" as that term is defined in the Stipulated Protective Order Regarding the Disclosure and Use of Confidential Information (*Tavener v. ULX Partners, LLC*, Adv. Proc. No. 20-03142-KRH, ECF No. 48), as we intend to file the proposed Amended Complaint under seal.

Regards,  
**Rex Lee**  
*Of Counsel*  
Quinn Emanuel Urquhart & Sullivan, LLP

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